

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CARMEN DIXON-ROLLINS,  v.  EXPERIAN INFORMATION SOLUTIONS, INC., <i>et al.</i> ,	) ) ) Plaintiff, ) ) ) Defendants. )
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C.A. No: 2:09-cv-00646-TJS

**PROPOSED JURY VERDICT FORM**

**Question 1.**

CIRCLE ONE:

YES            NO            Was any defendant or former defendant negligent in its reinvestigations of Plaintiff's disputes of inaccurate information?  
If yes, designate such defendant's percentage of negligence.

Experian: \_\_\_\_\_%

ACCB:        \_\_\_\_\_%

Chancellor:    \_\_\_\_\_%

Trans Union:    \_\_\_\_\_%

*If the Answer to Question No. 1 is "NO,"  
no further responses are required.*

Question No 3

CIRCLE ONE:

YES            NO            Was Plaintiff harmed by any defendants' or former defendants' reinvestigation of her disputes concerning the ACCB and Chancellor accounts.

*If the Answer to Question Nos. 3 is "NO," no further responses are required. If your answer to Question 3 is "YES":*

Question No. 4a.        THE EMOTIONAL DISTRESS AND ACTUAL HARM QUESTIONS WILL BE SUBMITTED ONLY IF TRANS UNION'S MOTION IN LIMINE and DIRECTED VERDICT ARE DENIED.

Compensatory Damages Award for all emotional distress harm, if any, which you find that Plaintiff suffered: \$\_\_\_\_\_. Designate the percentage of harm, if any, caused by each defendant or former defendant.

Experian: \_\_\_\_%

ACCB: \_\_\_\_%

Chancellor: \_\_\_\_%

Trans Union: \_\_\_\_%

Question No. 4b.

Compensatory Damages Award for all actual financial harm, if any, which you find that Plaintiff suffered: \$\_\_\_\_\_.

Designate the percentage of harm, if any, caused by each defendant and/or former defendant.

Experian: \_\_\_\_%

ACCB: \_\_\_\_%

Chancellor: \_\_\_\_%

Trans Union: \_\_\_\_%

Respectfully submitted,

KOGAN, TRICHON & WERTHEIMER, P.C.

*s/Bruce S. Luckman* \_\_\_\_\_

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